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Driving progress
through partnership

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November 29, 2022

12/9/2022

The requested sealing of portions
of the SJ motion are granted. SO
ORDERED.



The Honorable Paul A. Crotty
United States District Court
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *E.V. v. Oxford Health Plans (NY), Inc. (“Oxford”), erroneously sued as United Healthcare Oxford, and United Behavioral Health (“UBH”) (collectively, “United”), S.D.N.Y., No. 1:22-CV-02855-PAC*

Dear Judge Crotty:

We represent Defendants Oxford Health Plans (NY), Inc. (“Oxford”), erroneously sued as United Healthcare Oxford, and United Behavioral Health (“UBH”) (collectively, “United”) in the above-referenced matter. Pursuant to the Court’s Individual Motion Practices and Rules, United writes to request sealing of certain portions of its Motion for Summary Judgment (“Motion”) and accompanying exhibits.

The aforementioned Motion is being filed contemporaneously with proposed redactions.

United’s Motion quotes or paraphrases information that United has determined to be designated as Confidential pursuant to the Stipulated Confidentiality Agreement and Protective Order (“Protective Order”) in this matter. (Dkt. #45). Specifically, United’s Motion and Statement of Material Facts contain Protected Health Information and Individually Identifiable Information, which are protected by HIPAA and are deemed Confidential under Section 2 of the Protective Order. Exhibit A contains documents that constitute Defendants’ confidential and proprietary business information and have been marked as Attorney’s Eyes Only pursuant to the Protective Order, and therefore should remain wholly under seal.

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As such, United respectfully requests that the redactions in its Motion remain under seal. United thanks the Court for its consideration of this request.

Respectfully submitted,

/s/ Samuel Kadosh
Samuel Kadosh
Rebecca R. Hanson

cc: Counsel of Record (*via CM/ECF*)